

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

JOHN E. JAUNICH, individually and
on behalf of all others similarly situated,

Case No. 20-cv-1567 (PAM/BRT)

Plaintiff,

v.

STATE FARM LIFE INSURANCE
COMPANY,

Defendant.

PLAINTIFF'S MOTION FOR CLASS CERTIFICATION

Plaintiff John E. Jaunich hereby moves this Court for an Order certifying this case as a class action under Fed. R. Civ. P. 23(b)(2), 23(b)(3), and/or 23(c)(4). This motion is based on Memorandum of Law in Support of Plaintiff's Motion for Class Certification and the exhibits thereto, the Declaration and Report of Scott J. Witt and the exhibits thereto, the Court's file in this matter, and such other and further evidence and argument as may be accepted and heard by the Court. Plaintiff seeks certification of the following Class:

All persons who own or owned a universal life policy issued by State Farm on its policy form 94030 in the State of Minnesota whose policy was in-force on or after January 1, 2002 and who was subject to at least one monthly deduction.¹

¹ Excluded from the Class are: State Farm; any entity in which State Farm has a controlling interest; any of the officers, directors, or employees of State Farm and their immediate family, the legal representatives, heirs, successors, and assigns of State Farm; anyone employed with Plaintiff's counsel's firms; any Judge to whom this case is assigned, and his or her immediate family; and policies that insured males with an issue age of zero and terminated in the first policy year.

There are no other class actions pending against State Farm making the claims asserted here on behalf of a Minnesota class.

Plaintiff intends to prove direct notice by mail the last known address of each member of the Class using information within State Farm's administrative systems.

Dated: June 16, 2021

Respectfully submitted,

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